

In addition, we submit that a fair interpretation of the word "integral" as used in claim 1 does not support the Examiner's suggestion that an "integral" printer is equivalent to a "connected" printer. The Examiner admits that the word "integral" implies that it is "is part of a whole". We agree, and submit that an "integral printer" disclosed in the prior art must be part of such a whole. However, as defined in claim 1, the "whole" is a gaming console device", not some random interconnected set of devices where on happens to be a gaming console and another a printer. The printer disclosed in Silverbrook '290 (quite aside from the fact that there is no gaming console disclosed) is not "integral" with, or "part of a whole", device; it is a stand-alone printer that happens to be connectable to the video-editing device. Mere electronic connection does not, as the Examiner suggests, make the printer integral with the Silverbrook '290 device (which is not a gaming console, in any event).

In support of our argument, we submit that a phrase such as "A gaming console with integral printer" would immediately be interpreted by those skilled in the art, as well as the general public, as a gaming console that has an in-built printer. We strongly submit that a gaming console that had, for example, an outer socket for connecting an external printer would *not* be considered by anyone to have an "integral printer", whether a printer happened to be connected via the socket or not. In effect, the claims in the present application are linguistically equivalent to that statement. Claim 1, for example, defines "A video game console device including... an integral printer apparatus". We submit that this choice of language clearly requires the printer to be incorporated into the video game apparatus, not merely connected in some remote way via, for example, a network or cable. For these reasons, we submit that the present invention as defined in claim 1 is clearly patentable over the cited art.

If the Examiner wishes to maintain the rejection of the claims on this basis, it would be appreciated if an explanation could be provided as to how the phrase "a gaming console with integral printer" (as effectively defined in claim 1) could be interpreted on the basis of the plain, ordinary meaning of its words as including within its scope a remotely connected printer. It would also be appreciated if the Examiner could explain in detail how the dedicated audio-visual editing device of Silverbrook '290 is equivalent to a videogame console device (again, as defined in claim 1) in terms of hardware, software and input/output requirements and capabilities. We would point out that even if there was some capability to program Silverbrook '290 to play games (and there isn't), this would still not be sufficient,

since the citation is concerned exclusively with video editing, which teaches squarely away from gaming per se.

The remaining claims also define further novel and inventive features. For example, claim 2 defines an "integral internal print media supply unit", where the unit is clearly required to be "integral" with the gaming console device. Again, this is not shown or suggested in any of the prior art, or the reasons discussed above in relation to the word integral.

Claim 4 requires that the images be printed out on business-card sized sheets of paper or card. This is a desirable feature of the invention that is not disclosed or suggested in any of the citations.

Claim 5 requires that the print media and ink supply unit be housed in a replaceable cartridge assembly. This feature is not disclosed or suggested in any of the citations.

Claim 6 requires that the cartridge include a print media feed roller device that interacts with a print media feed mechanism provided within the console. Again, there is no disclosure or suggestion whatsoever of such a feature in the citations.

Claim 7 relates to a particularly desirable aspect of the present invention, in which the interactive program (ie, game) is activated to print out images via the printer at predetermined positions in the program. The citations are completely silent on this feature.

Claim 9 defines a pagewidth array of ink ejection nozzles, and there is no disclosure or suggestion of such a feature in any of the citations.

In view of the comments above, favourable reconsideration of the present application is respectfully requested.

Very respectfully,

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